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JUN 14 2019

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Ellen Elizabeth (Packenham)
Stanley

Plaintiff,

vs.

United States of America,
DBA: The Social Security
Administration

Defendant(s).

Case No. 19-cv-1582 DWF/SER
(To be assigned by Clerk of District
Court)

DEMAND FOR JURY
TRIAL

YES X NO

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Ellen Elizabeth (Packenham) Stanley
Street Address P.O. Box 21688
County, City Dakota County, City of Eagan
State & Zip Code Minnesota 55121
Telephone Number (651) 405-4775



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name The United States of America
DBA: The Social Security Administration
 Street Address 950 Pennsylvania Avenue NW
 City, State, Zip Code Washington DC 20530-0001

JURISDICTION

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ **Federal Question** ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

U.S. Code Title 18, Part I, Chapter 96, Section 1964 (c)

5. Diversity of Citizenship - **NO**

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

G Defendant(s) reside in Minnesota ☒ **Facts alleged below primarily occurred in Minnesota**

G Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. The Plaintiff will show specific evidence that specific employees working at the Social Security Administration did in fact commit multiple acts violating the Title IX of the Organized Crime Control Act of 1970 (RICO) including mail fraud under 940.18 U.S.C. §1341; wire fraud under 941.18 U.S.C. §1343; and extortion under 9.131 - THE HOBBS ACT - 18 U.S.C. §1951(b)(2); these violations were perpetrated against the Plaintiff on several dates beginning in January of 2009 and continuing through June of 2019 including but not limited to:

Mail Fraud under 940.18 U.S.C. §1341;

- 1) Letter of Overpayment dated April 7, 2014
- 2) Letter of Reduction in Benefits dated May 6, 2014
- 3) Letter of Questionable Benefit Deposit dated July 16, 2014
- 4) Letter of Overpayment dated August 19, 2014
- 5) Letter of Review dated September 13, 2014
- 6) Letter of Parisi Reduction dated September 17, 2014
- 7) Letter of Reduction in Benefits and Amount Owed dated September 18, 2014
- 8) Letter of Balance Owed dated November 26, 2014
- 9) Letter of Withholding from Benefit Deposits dated October 28, 2015
- 10) Letter of Benefit Increase dated June 4, 2019

Wire Fraud under 941.18 U.S.C. §1343:

- 1) False Deposit dated 02/24/2009
- 2) False Reduction in Benefits dated 5/12/2014
- 3) False Reduction in Benefits dated 6/09/2014
- 4) False Reduction in Benefits and Questionable Deposit of \$12,050 dated 7/14/2014
- 5) False Reduction in Benefits dated 08/11/2014
- 6) False Reduction in Benefits dated 09/08/2014
- 7) False Reduction in Benefits dated 10/10/2014
- 8) False Reduction in Benefits dated 11/10/2014
- 9) False Reduction in Benefits (\$32) ongoing each month from 11/2015 thru 07/2018
- 10) Questionable Deposit dated June 3, 2019

Extortion under 9.131 - THE HOBBS ACT - 18 U.S.C. §1951(b)(2)

The Social Security Administration Employees control their computer system and it's activities through data entry, therefore, the data entry actions along with the constant threat by these officials to discontinue the Plaintiffs benefits completely, would be construed as extortion as outlined in paragraph (2) of this section: "The term "extortion" means the obtaining of property from another, with his consent... or fear, or under color of official right."

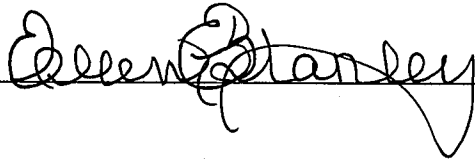
Due to the miscalculation and misappropriation of the Plaintiff's funds by the Social Security Administration, through their use of mail and wire, the Plaintiff has suffered egregious physical, psychological and emotional harm due to the loss of her home, the death of her dog, and the loss and damage of her personal private property.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking:

In following the United States Department of Justice CRM (Criminal Resources Manual) Section 943. NO LOSS OR GULLIBLE VICTIMS guideline, the Plaintiff asks this court to order compensation be paid to the Plaintiff for the damages caused by the United States of America DBA: The Social Security Administration. A minimum of \$300,000.00 granted, with a total recovery of treble damages, in the amount of \$900,000.00 plus any future costs and legal fees.

Date: June 14, 2019

Plaintiff	<u>Ellen Elizabeth Stanley</u>
Mailing Address	<u>P.O. Box 21688</u>
	<u>Eagan MN 55121</u>
Telephone Number	<u>(651) 405-4775</u>
Signature of Plaintiff	<u></u>